

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

TRISH MANGUAL ROLDAN
DEBTOR

CASE NO. 15-02360-BKT
CHAPTER 13

**DEBTOR'S MOTION AND NOTICE OF FILING OF POST-CONFIRMATION
MODIFICATION OF CHAPTER 13 PLAN 11 USC §1329**

TO THE HONORABLE COURT:

NOW COMES, TRISH MANGUAL ROLDAN, through the undersigned attorney, and very respectfully states and prays as follows:

1. The debtor is hereby submitting a post-confirmation modification of Chapter 13 Plan, 11 USC Section 1329, dated December 18, 2015, herewith and attached to this motion.
2. This Plan modification is filed to amend the Payment Plan Schedule in order to comply with the distribution of the confirmed Plan (docket #19) and cure the feasibility issue raised by the Trustee in his *Trustee's Position Regarding Urgent Motion Requesting Authorization for Loan* (docket #38).

NOTICE PURSUANT TO LOCAL BANKRUPTCY RULE 3015(f)(2)(b)

Within twenty-one (21) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

I CERTIFY, that on this same date a copy of this Notice was filed with the Clerk of the Court using the CM/ECF system which will send notice of same to the Chapter 13 Trustee, and all CM/ECF participants; I also certify that a copy of this notice was sent via regular mail to the debtor and to all creditors and interested parties appearing in the master address list, hereby attached.

Page 2
Case no. 15-02360-BKT13
Post confirmation modification of chapter 13 Plan

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 18th day of December, 2015.

/s/Roberto Figueroa Carrasquillo
ROBERTO FIGUEROA CARRASQUILLO
USDC 203614
ATTORNEY FOR PETITIONER
PO BOX 186 CAGUAS PR 00726
TEL 787-744-7699 FAX NO 787-746-5294
EMAIL: rfigueroa@rfclawpr.com

United States Bankruptcy Court
District of Puerto Rico

IN RE:

Case No. 3:15-bk-2360

MANGUAL ROLDAN, TRISH

Chapter 13

Debtor(s)

AMENDED CHAPTER 13 PAYMENT PLAN

1. The future earnings of the Debtor(s) are submitted to the supervision and control of the Trustee and the Debtor(s) shall make payments to the Trustee directly by payroll deductions as hereinafter provided in the PAYMENT PLAN SCHEDULE.
2. The Trustee shall distribute the funds so received as hereinafter provided in the DISBURSEMENT SCHEDULE.

<p>PLAN DATED: <u>12/18/2015</u></p> <p><input type="checkbox"/> PRE <input checked="" type="checkbox"/> POST-CONFIRMATION</p> <p>I. PAYMENT PLAN SCHEDULE</p> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 10%;">\$</td> <td style="width: 10%;">200.00</td> <td style="width: 10%;">x</td> <td style="width: 10%;">3</td> <td style="width: 10%;">= \$</td> <td style="width: 10%;">600.00</td> </tr> <tr> <td>\$</td> <td>220.00</td> <td>x</td> <td>9</td> <td>= \$</td> <td>1,980.00</td> </tr> <tr> <td>\$</td> <td>254.00</td> <td>x</td> <td>48</td> <td>= \$</td> <td>12,192.00</td> </tr> <tr> <td>\$</td> <td></td> <td>x</td> <td></td> <td>= \$</td> <td></td> </tr> <tr> <td>\$</td> <td></td> <td>x</td> <td></td> <td>= \$</td> <td></td> </tr> </table> <p style="text-align: center;">TOTAL: \$ <u>14,772.00</u></p> <p>Additional Payments: \$ _____ to be paid as a LUMP SUM within _____ with proceeds to come from:</p> <p><input type="checkbox"/> Sale of Property identified as follows: _____ _____</p> <p><input type="checkbox"/> Other: _____ _____</p> <p>Periodic Payments to be made other than, and in addition to the above: \$ _____ x _____ = \$ _____</p> <p>PROPOSED BASE: \$ <u>14,772.00</u></p> <p>III. ATTORNEY'S FEES (Treated as § 507 Priorities)</p> <p>Outstanding balance as per Rule 2016(b) Fee Disclosure Statement: \$ <u>2,868.00</u></p> <p>Signed: <u>/s/ TRISH MANGUAL ROLDAN</u> Debtor</p> <p>Joint Debtor</p>	\$	200.00	x	3	= \$	600.00	\$	220.00	x	9	= \$	1,980.00	\$	254.00	x	48	= \$	12,192.00	\$		x		= \$		\$		x		= \$		<p><input type="checkbox"/> AMENDED PLAN DATED: _____ Filed by: <input type="checkbox"/> Debtor <input type="checkbox"/> Trustee <input type="checkbox"/> Other</p> <p>II. DISBURSEMENT SCHEDULE</p> <p>A. ADEQUATE PROTECTION PAYMENTS OR _____ \$ _____</p> <p>B. SECURED CLAIMS: <input type="checkbox"/> Debtor represents no secured claims. <input checked="" type="checkbox"/> Creditors having secured claims will retain their liens and shall be paid as follows:</p> <ol style="list-style-type: none"> 1. <input checked="" type="checkbox"/> Trustee pays secured ARREARS: Cr. <u>First Bank De Puerto</u> Cr. _____ Cr. _____ # <u>Claim 5-1</u> # _____ # _____ \$ <u>10,213.97</u> \$ _____ \$ _____ 2. <input type="checkbox"/> Trustee pays IN FULL Secured Claims: Cr. _____ Cr. _____ Cr. _____ # _____ # _____ # _____ \$ _____ \$ _____ \$ _____ 3. <input type="checkbox"/> Trustee pays VALUE OF COLLATERAL: Cr. _____ Cr. _____ Cr. _____ # _____ # _____ # _____ \$ _____ \$ _____ \$ _____ 4. <input checked="" type="checkbox"/> Debtor SURRENDERS COLLATERAL to Lien Holder: AEELA 5. <input type="checkbox"/> Other: 6. <input checked="" type="checkbox"/> Debtor otherwise maintains regular payments directly to: Sistema De Retiro First Bank De Puerto <p>C. PRIORITIES: The Trustee shall pay priorities in accordance with the law. 11 U.S.C. § 507 and § 1322(a)(2)</p> <p>D. UNSECURED CLAIMS: Plan <input type="checkbox"/> Classifies <input checked="" type="checkbox"/> Does not Classify Claims.</p> <ol style="list-style-type: none"> 1. (a) Class A: <input type="checkbox"/> Co-debtor Claims / <input type="checkbox"/> Other: _____ <input type="checkbox"/> Paid 100% / <input type="checkbox"/> Other: _____ Cr. _____ Cr. _____ Cr. _____ # _____ # _____ # _____ \$ _____ \$ _____ \$ _____ 2. Unsecured Claims otherwise receive PRO-RATA disbursements. <p>OTHER PROVISIONS: (Executory contracts; payment of interest to unsecureds, etc.) * "Tax refunds will be devoted each year, as periodic payments, to the plan's funding until plan completion. The plan shall be deemed modified by such amount, without the need of further Court order. The debtor(s) shall seek court's authorization prior any use of funds." "Surrenders collateral" : Shares/savings in any Cooperativa/Association/Bank</p>
\$	200.00	x	3	= \$	600.00																										
\$	220.00	x	9	= \$	1,980.00																										
\$	254.00	x	48	= \$	12,192.00																										
\$		x		= \$																											
\$		x		= \$																											

Label Matrix for local noticing

0104-3

Case 15-02360-BKT13

District of Puerto Rico

Old San Juan

Fri Dec 18 15:24:02 AST 2015

US Bankruptcy Court District of P.R.

Jose V Toledo Fed Bldg & US Courthouse

300 Recinto Sur Street, Room 109

San Juan, PR 00901-1964

FIRST BANK DE PUERTO RICO VTQ

MARTINEZ TORRES LAW OFFICES PSC

PO BOX 192938

SAN JUAN, PR 00919-3409

RELIABLE FINANCIAL SERVICES

PO BOX 21382

SAN JUAN, PR 00928-1382

AEELA

PO Box 364508

San Juan, PR 00936-4508

AT&T Services, Inc

IBM Bldg Suite 2000 654 M Rivera Ave

San Juan, PR 00918

Advanced Collection Services, Inc

PO Box 364607

San Juan, PR 00936-4607

American InfoSource LP as agent for

T Mobile/T-Mobile USA Inc

PO Box 248848

Oklahoma City, OK 73124-8848

BANCO POPULAR DE PUERTO RICO

BANKRUPTCY DEPARTMENT

PO BOX 366818

SAN JUAN PR 00936-6818

Banco Popular De PR

PO Box 364445

San Juan, PR 00936-4445

Banco Popular De PR -Mcard

PO Box 3228

San Juan, PR 00936

Banco Popular De PR -Visa

PO Box 362708

San Juan, PR 00936-2708

First Bank De Puerto Rico

PO Box 9146

San Juan, PR 00908-0146

Five Star Club Corp

Isla Verde Mall Ste 218

Carolina, PR 00979-7082

Martinez & Torres Law Offices

Civil Num: ECD2014-0554

PO Box 192938

San Juan, PR 00919-3409

Midland Funding LLC

PO Box 194499

San Juan, PR 00919-4499

Money Express

PO Box 11890

San Juan, PR 00922-1890

Nationalwide Recovery Systems

PO Box 702257

Dallas, TX 75370-2257

Office Max Consumer Credit

PO Box 5174

Sioux Falls, SD 57117

Operating Partners

Civil Num: EDCI2015-15

PO Box 194499

San Juan, PR 00919-4499

Operating Partners

Civil Num: EDCI2015-7

PO Box 194499

San Juan, PR 00919-4499

Premier Bankcard, Llc

c/o Jefferson Capital Systems LLC

Po Box 7999

Saint Cloud Mn 56302-7999

Rodriguez Fernandez Law Offices PSC

Lcdo Osvaldo L Rodriguez Fernandez

PO Box 71418

San Juan, PR 00936-8518

Sallie Mae

PO Box 6180

Indianapolis, IN 46206-6180

Sears

PO Box 6189

Sioux Falls, SD 57117-6189

Sistema De Retiro

PO Box 42003

San Juan, PR 00940-2203

Solmelia

1214 Ave Ashford

San Juan, PR 00907-1331

Sun Com

PO Box 64566

Baltimore, MD 21264-4566

Synchrony Bank

c/o of Recovery Management Systems Corp

25 S.E. 2nd Avenue, Suite 1120

Miami, FL 33131-1605

T-mobile

12920 Se 38th Stree

Bellevue, WA 98006-7305

T-mobile
12920 Se 38th Street
Bellevue, WA 98006-7305

JOSE RAMON CARRION MORALES
PO BOX 9023884
SAN JUAN, PR 00902-3884

MONSITA LECAROZ ARIBAS
OFFICE OF THE US TRUSTEE (UST)
OCHOA BUILDING
500 TANCA STREET SUITE 301
SAN JUAN, PR 00901

ROBERTO FIGUEROA CARRASQUILLO
PO BOX 186
CAGUAS, PR 00726-0186

TRISH MANGUAL ROLDAN
PO BOX 947
GURABO, PR 00778-0947

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

(d) RELIABLE FINANCIAL SERVICES, INC.
P.O. BOX 21382
SAN JUAN, PR 00928-1382

	End of Label Matrix
Mailable recipients	34
Bypassed recipients	0
Total	34